

OMB's CLARIFICATION QUESTIONS/COMMENTS FOR CBSV

1. **General comment:** In response to preliminary OMB questions regarding the interface between CBSV and DHS's system, SSA said: "The design and purpose of the system is to provide the inquirer with only a "yes" or "no" response as to whether the SSN verified with our records. CBSV will not in any way interface with the DHS I-9 verification system and will **not** be used for that purpose. We will update the appropriate documents to clearly reflect this." Please revise the documents to make this clear and provide OMB with this revised language.

Response: The CBSV User Agreement (p. 3) and User Guide (p. 3) are attached and have been updated with the following language:

"NOTE: CBSV is designed to provide you with only a "yes" or "no" verification of whether the SSN verified with SSA's records. This verification does not interface with the Department of Homeland Security (DHS) verification system and will not satisfy DHS's I-9 requirements."

2. **Page 7, CBSV Supporting Statement:** Please explain the change in the cost of storing the electronic forms from \$20,000 in the draft notice to \$300 in the final notice. Is this for the entire seven years? It seems like it could cost more than \$300 just to scan in the forms.

Response: In the Federal Register Notice published on 8/10/07 at 72 FR 45079, we inadvertently gave this cost as being \$20,000 **per** participating company rather than the aggregate total cost for all estimated participants. Our most recent data reveals that the true cost is \$300 **per** company, per year to store consent forms electronically. Therefore, the aggregate total yearly cost burden for the estimated companies participating is \$27,000.

3. **Page 7, CBSV supporting statement:** Please explain how much it would cost to keep the expiration date updated on the website. A change like this would only require html programming changes: why would a new software release be necessary?

Response: The OMB Clearance information is displayed on "protected" pages (e.g., those that are shown to a user after they have logged into the system). While the actual HTML coding change is simple, the release of protected pages requires the Agency to execute rigorous lifecycle activities that require effort to unit and integration test before deployment to the production environment.

4. **Page 3, CBSV Addendum C:** (1) Since SSA is required to recoup the full cost, why doesn't it include fallout costs to the field? (2) The User Agreement didn't have any statements regarding actions the requester should take to minimize the field office impact.

Response: (1) SSA will monitor CBSV and determine what impact it has on field offices (FO). We will then determine the appropriateness of including the costs in the fee structure. Initial fee computations assume the proposed process would not result in a high percentage of "no match" transactions; thus, minimizing the need for FO contact by an individual to correct the SSA records. If actual experience results in significant "fall-out" costs in FOs, with no benefit to SSA programs, the transaction fee will be adjusted accordingly. (2) Following is the excerpt from the User Guide (bottom of page 10 to the top of page 11) outlining the actions a requester should take before referring an individual to SSA. Once the requester has taken the outlined steps to ensure what they submitted to SSA is correct, the requester will need to refer the individual to SSA for any appropriate action.

“If the Verification Code does not equal BLANK, we suggest that you may wish to do the following:

Ask to see the individual's Social Security Card to assure that the SSN and name were correctly shown on your input file.

If an error was made on your input file, correct your records and resubmit only the corrected SSN and related data to SSA in a subsequent input file. Do not resubmit data that has already been correctly processed.

If the SSN card and your input file match, ask the individual to go to the nearest Social Security Field Office to determine the nature of the problem.”

5. **Page 8, CBSV User Agreement:** How frequently will the user agreement be updated? In particular, the protocol for transmitting data will need to be updated periodically.

Response: The User's Guide will be updated when the system changes, including any changes required for the protocol for transmitting data. As part of routine activities, SSA's Office of Systems maintains awareness of industry best practices for data transmission, and incorporates them into appropriate infrastructure and applications as necessary and as part of the routine application maintenance. This would include updates of appropriate Users' Guides, which will be available on the CBSV website. In addition, users are notified of changes through announcements placed on appropriate web pages prior to their enforcement. Most user guides that we maintain are updated at least once a year.

6. **Page 9, CBSV User Agreement:** If a company receives a notice of rate increases and decides to terminate, would they continue receiving the service until their advance payment is used up or would they receive a refund?

Response: Periodically SSA will calculate its costs to provide CBSV services and will adjust the fee charged as needed. Companies will be notified in writing of any change and will have the opportunity to cancel the agreement or continue service using the new transaction fee. If they cancel the agreement, SSA would stop the service effective with the date of the rate change and refund any monies in the account.

7. **Form SSA 89:** How would an individual indicate that they consented to a longer time period than 90 days (the section in bold on the form)?

Response: The individual can authorize a longer or shorter time period for the consent by striking through the 90-day time period, write in the specified time frame and initial and date the change. The User Agreement (p. 4) has been changed to reflect this procedure.

8. **Page 8, CBSV User Guide:** What does “MMDDCCYY” mean? Suggest writing it out as “YYMMDD” is defined above.

Response: This instruction is intended for technical personnel/programmers who would be preparing CBSV files for submittal to the Agency. "MMDDCCYY" is an industry-standard method for identifying a date (two-digit month, two-digit date, two-digit century, and two-digit year) that will be recognized and understood by programmers preparing files for submittal through this application. The file format requirement is 8 digits; therefore, the 6 position "YYMMDD" would be incorrect. The “YYMMDD” format in the User Guide (attached) file submittal section has been corrected with the “MMDDCCYY” industry standard.

9. **Page 9, CBSV User Guide:** If the leader for the verification code is a series of blanks in spaces 49-97, this seems confusing that the confirmation is also a blank in space 98.

Response: The fields in question are similar in layout to output files from existing Agency applications, and have been successfully used by many users with no known issues. This approach enables the Agency to retain consistency across similar applications. Automated systems consistently handle consecutive blanks in defined positions without difficulty or confusion.